IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

This document applies to:

ETHICON WAVE 8 CASES LISTED IN EXHIBIT A TO DEFENDANTS' NOTICE OF ADOPTION

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF REPLY IN SUPPORT OF PRIOR DAUBERT MOTION TO EXCLUDE NEERAJ KOHLI, M.D. FOR ETHICON WAVE 8

Defendants hereby adopt and incorporate by reference the Wave 3 Reply in Support of Motion to Exclude General-Causation Testimony of Neeraj Kohli, M.D., M.B.A., Dkt. 3022. Defendants respectfully request that the Court exclude Dr. Kohli's testimony, for the reasons expressed in the Wave 3 briefing. This notice applies to the Wave 8 cases identified in Exhibit A attached to Defendants' Wave 8 Notice of Adoption, Dkt. 6823.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561 william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage

44811535.v1